

## REMARKS

In the Final Office Action mailed April 7, 2006, the Examiner took the following action: (1) rejected claims 1 and 2 under 35 U.S.C. 102(b) as being anticipated by York (U.S. 4,932,814); (2) rejected claim 3 under 35 U.S.C. 103(a) as being unpatentable over York; (3) rejected claims 4-6 and 8-10 under 35 U.S.C. 103(a) as being unpatentable over York in view of Orrell (U.S. 4,720,897); (4) rejected claim 9 under 35 U.S.C. 103(a) as being unpatentable over York in view of Orrell, and further in view of "Official Notice"; (5) rejected claims 7 and 11 under 35 U.S.C. 103(a) as being unpatentable over York in view of Orrell and further in view of Kostorzewski (U.S. 5,072,948); (6) rejected claim 12 under 35 U.S.C. 103(a) as being unpatentable over York in view of Brown (U.S. 6,382,889 B1); and (7) rejected claims 13-26 under 35 U.S.C. 103(a) as being unpatentable over York in view of Orrell and further in view of Boyl-Davis (U.S. 6,843,328 B2).

Applicant wishes to thank Examiner Talbot for his courtesy and consideration in conducting a telephone interview on July 31, 2006. In that telephone interview, the undersigned respectfully submits that agreement was reached that the above-proposed limitations that were added to claims 1, 13, and 23 patentably define over the art of record, however, the Examiner reserved the right to issue an Advisory Action that imposed a requirement for an additional search based on new issues raised by Applicant's proposed amendments if the Examiner believes, after consideration of the proposed amendments, that such an additional search is warranted. Accordingly, Applicant requests reconsideration of the application in view of the foregoing amendments and the following remarks.

I. *Rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)*

Claims 1-12

As amended, claim 1 recites an apparatus for performing a manufacturing operation on a workpiece, the apparatus comprising a base member having a first aperture disposed therethrough; a drive platform having a second aperture disposed therethrough, the drive platform being spaced apart from the base member by a separation distance and aligned with the base member such that the first and second apertures are approximately aligned along an axis; a plurality of guide members extending between the drive platform and the base member, at least one of the drive platform and the base member being moveable along the guide members to increase or decrease the separation distance; at least one drive member operatively coupled between the drive platform and the base member, *wherein the plurality of guide members and the at least one drive member are distributed around a perimeter of the first and second apertures*; and a servo motor operatively coupled to the drive member such that as the servo motor drives the drive member, the separation distance is varied. (emphasis added).

As noted above, agreement has been reached with the Examiner that the proposed amended claim defines over the art of record (York, Orrell, Kostrzewski, Brown, and Boyd-Davis). Therefore, claim 1 is allowable. Claims 2-12 depend from claim 1 and are also allowable at least due to their dependencies on claim 1, and also due to additional limitations recited in those claims.

#### Claims 13-22

Similarly, claim 13 recites an apparatus for performing a manufacturing operation on a workpiece, the apparatus comprising a track assembly adapted to be attached to the workpiece; a carriage assembly moveably coupled to the track assembly and moveable relative to the workpiece; and a tool feed unit coupled to the carriage assembly and adapted to be coupled to a tool assembly and to controllably engage the tool assembly with the workpiece, the tool feed unit including: a base member having a first aperture disposed therethrough; a drive platform having a second aperture disposed therethrough, the drive platform being spaced apart from the base member by a separation distance and aligned with the base member such that the first and second apertures are approximately aligned along an axis; a plurality of guide members extending between the drive platform and the base member, at least one of the drive platform and the base member being moveable along the guide members to increase or decrease the separation distance; at least one drive member operatively coupled between the drive platform and the base member, *wherein the plurality of guide members and the at least one drive member are distributed around a perimeter of the first and second apertures*; and a servo motor operatively coupled to the drive member such that as the servo motor drives the drive member, the separation distance is varied. (emphasis added).

As noted above, agreement has been reached with the Examiner that the proposed amended claim defines over the art of record (York, Orrell, Kostrzewski, Brown, and Boyd-Davis). Therefore, claim 13 is allowable. Claims 14-22 depend from claim 13 and are also allowable at least due to their dependencies on claim 13, and also due to additional limitations recited in those claims.

#### Claims 23-26

Claim 23 recites a method of performing a manufacturing operation on a workpiece, the method comprising providing a tool feed unit having a base member moveably coupled to a drive platform by a plurality of guide members, the base member defining a first aperture and the drive platform defining a second aperture approximately aligned with the first aperture along an axis, at least one of the drive platform and the base member being moveable along the guide members to increase or decrease a separation distance therebetween, the tool feed unit including at least one drive member operatively coupled between the drive platform and the base member, and a servo motor operatively coupled to the at least one drive member, *wherein the plurality of guide members and the at least one drive member are distributed around a perimeter of the first and second apertures*; operatively coupling a manufacturing tool to the tool feed unit; and controllably rotating the at least one drive member using the servo motor to vary a separation distance between the drive platform and the base member and to engage the manufacturing tool with the workpiece. (emphasis added).

As noted above, agreement has been reached with the Examiner that the proposed amended claim defines over the art of record (York, Orrell, Kostzewski, Brown, and Boyd-Davis). Therefore, claim 23 is allowable. Claims 24-26 depend from claim 23 and are also allowable at least due to their dependencies on claim 23, and also due to additional limitations recited in those claims.

### CONCLUSION

Applicant respectfully submits that pending claims 1-26 are now in condition for allowance. If there are any remaining matters that may be handled by telephone conference, the Examiner is kindly invited to telephone the undersigned at the telephone number listed below.

Respectfully Submitted,

Dated: Aug. 3, 2006

By: Dale C. Barr

Dale C. Barr  
Lee & Hayes, PLLC  
Reg. No. 40,498  
(206) 315-7916

60483

CUSTOMER NUMBER